

DEPARTMENT OF
HEALTH AND ENVIRONMENTAL SCIENCES



STAN STEPHENS, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

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April 20, 1989

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Dear Librarian:

Please find enclosed the revised Silver Bow Creek Community Relations Plan.

If you have any questions or comments concerning this document, please write or call.

Sincerely,

Jane Stiles

Jane Stiles
Public Information Officer
Superfund Program
Solid and Hazardous Waste Bureau

JS:nl

Enclosure

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COMMUNITY RELATIONS PLAN
SILVER BOW CREEK SUPERFUND SITE
SOUTHWESTERN MONTANA

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Montana Department of Health and Environmental Sciences

Solid and Hazardous Waste Bureau

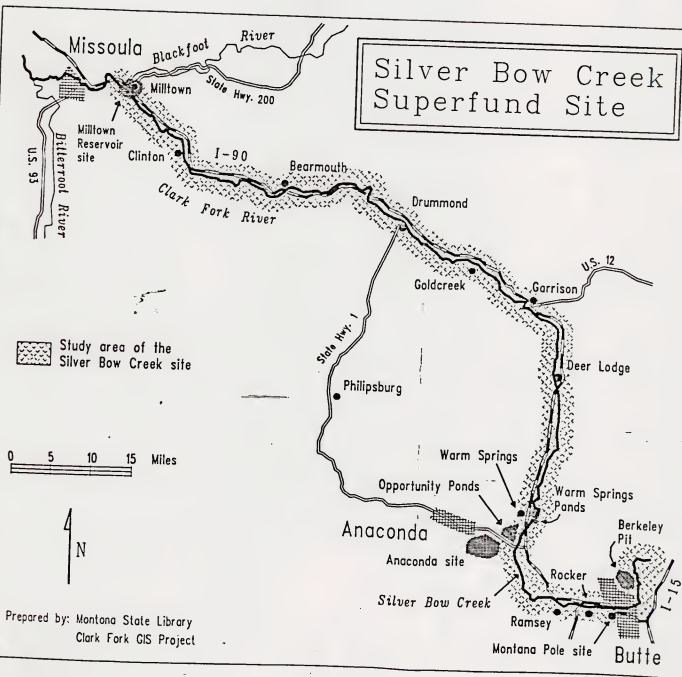
Room B201, Cogswell Building

Helena, MT 59620

April 1989

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Silver Bow Creek Superfund Site



Prepared by: Montana State Library
Clark Fork GIS Project



This community relations plan identifies issues of community concern regarding the Silver Bow Creek Superfund site in southwestern Montana and outlines community relations activities to be conducted during the remedial investigation and feasibility study (RI/FS) of the site. This plan was prepared in accordance Community Relations in Superfund: A Handbook, Interim Version, Office of Emergency and Remedial Response, U.S. EPA, June 1988. The Handbook provides the framework for development of the community relations plan in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This plan was prepared in accordance with, and is consistent with CERCLA, the NCP, and all pertinent EPA guidance. This plan will be revised as necessary, to comply with any statutory or regulatory requirements. (The reader is encouraged to refer to a summary of the requirements governing development of this plan in Appendix C.)

The purpose of the community relations plan as well as the entire program is to identify the concerns of people affected by the site, and develop methods to address those concerns. In order to develop a community relations program, the lead agency at the site, in this case MDHES, conducted community interviews and then prepared this plan for the site. The plan includes a description of the site background, history of community involvement at the site (including major community concerns), community relations objectives, a schedule of community relations activities, and a list of affected and interested groups and individuals. The interviews form the foundation for developing the appropriate information to be disseminated to the public, and for determining what actions are necessary to deal with public concerns. The Handbook states that "a community relations program should not try to quell controversy, but rather strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views."

It is important to emphasize that the community relations plan presents the opinions and concerns of residents and other interviewees and not those of the Montana Department of Health and Environmental Sciences (MDHES), EPA, or



the potentially responsible party (PRP). The information developed in these interviews and summarized in the community relations plan reflects interviewees' responses, whether or not those responses are factually precise or accurately portray conditions at the site. The community relations plan serves as a basis for addressing community concerns and also for clarifying misinformation identified in community responses. The plan suggests measures for accomplishing both of these objectives.

OVERVIEW OF THIS COMMUNITY RELATIONS PLAN

This plan was prepared by MDHES, which, as lead agency is responsible for managing Superfund activities at the site and for conducting the community relations program for the site. The U.S. EPA Region VIII Montana Operations Office in Helena has a concurrence role in these activities.

The purpose of the community relations program at the site is to allow the community to learn about and participate in the Superfund remedial process. To be effective, the community relations program must be gauged according to the community's desire for information, and its interest in participating in the Superfund process.

MDHES will conduct the community relations activities set forth in this plan to ensure the public has input into and an opportunity to participate in decisions regarding the Superfund investigative and cleanup activities to be conducted at the site. Implementation of the plan by MDHES will also keep the public well informed about site activities.

The information in this report was gathered in discussions conducted throughout the site area in June and July 1987 with local officials, area residents, agricultural interests, environmental groups, State and EPA officials with responsibility for the site, and other interested parties. The interviews were conducted informally. Residents were encouraged to expand on topics according to their own interests and experience. The information gathered during those interviews is supplemented by background gained from MDHES files and other interaction with the public and local governmental officials.

In general, community concern about the site and Superfund activities at



the site is high, although there are certain areas along the Clark Fork River where community concern is extremely low. Community members have strong opinions about the activities of the Montana Department of Health and Environmental Sciences (MDHES) at the site. A variety of organizations and individuals are interested in the site. The concerns of these different groups need to be considered in the decision-making process.

SITE BACKGROUND

The Silver Bow Creek site is a 120-mile long tract of land encompassing the floodplain of Silver Bow Creek and the upper Clark Fork River from the headwaters of Silver Bow Creek to the Milltown Reservoir, about 6 miles east of Missoula. The Silver Bow Creek site is located adjacent to the Anaconda Smelter, the Montana Pole and the Milltown Dam Superfund sites. The Butte Addition is located within the Silver Bow Creek site and is part of the site (see map). The EPA has lead responsibilities at the Butte Addition. Mining activities in the Butte and Anaconda area have contaminated the Anaconda, Milltown, and Silver Bow Creek sites with mining, milling, and smelter wastes.

When the Silver Bow Creek site was placed on the National Priorities List (NPL) in December 1982, the site boundaries extended from a point west of Butte downstream to Deer Lodge. In November 1985, the boundaries of the site were expanded to include the Butte Area in the Silver Bow Creek RI/FS studies. In early 1986, the site boundaries were expanded westward from Deer Lodge to the Milltown Reservoir. Investigation of the originally designated portion of the site began in 1984 when a cooperative agreement between the EPA and the State of Montana established the State as the lead agency in the RI/FS.

COMMUNITY BACKGROUND

Following is a brief history of the communities in and adjacent to the Silver Bow Creek site:



Butte and Anaconda area:

From the early 1870s to the late 1970s, Butte was one of the world's most productive mining districts because of rich copper deposits under the city and surrounding area. The Butte Hill has been called "the richest hill on earth," and at one time the Berkeley Pit, at the edge of Butte, was the largest open-pit mine in the world. In addition to the open mines, it is estimated that there are approximately 4,500 miles of mining tunnels under the city.

From the late 1800s to the early 1900s, seventeen active smelters and more than 100 different mines operated in the area. After the Anaconda Smelter was constructed in 1917, all smelting took place in Anaconda. The builder of this smelter, the Anaconda Copper Mining Company (ACMC), eventually emerged as the major employer in the area and a major mining company in the country. The smelter, which is part of the Anaconda site, became a major source of aerial, ground water, and surface water contamination in the area. The smelter smokestack, renowned as the highest in the world, is credited with depositing arsenic and other toxic substances over a wide area, extending a number of miles downwind from Anaconda. Silver Bow Creek flows through areas suspected to be heavily contaminated by this aerial deposition. In addition, the Opportunity Ponds, built by Anaconda Company to contain the wastes of smelting operations, are suspected to be a major source of ground water contamination in the area. Although the smelter is part of the Anaconda site, it had important impacts on the Silver Bow Creek site.

Depressed international copper prices, federal and state environmental requirements, and an expensive local labor market are some factors that brought the mining boom to an end in the late 1970s. Anaconda Copper Mining Company changed its name to Anaconda Minerals Company (AMC) in the 1970s. In June 1983, active mining was suspended in the Butte area. In December 1985, AMC with its parent company, Atlantic Richfield Company (ARCO), sold most of its property in the Butte area to the Washington Corporation which has reopened mining operations.

Other industries which have operated in the area include a sulfur recovery plant, three pole-treating facilities, a chemical company, and a refinery. All these sources are suspected of contributing contamination such as fluoride, phosphorus, creosote, arsenic, metals, pentachlorophenol, and diesel fuel to the site. Silver Bow Creek has been a primary recipient of



discharges from mining, milling, and smelting operations and the other industrial enterprises in the Butte area. Residents recall that for many years, prior to 1972, the creek and the upper Clark Fork River ran red when all mining, industrial discharges, and contaminated surface runoff flowed untreated into Silver Bow Creek.

In 1972, a water treatment facility was installed by AMC at the concentrator in Butte, where the ore was concentrated prior to transporting it to Anaconda for smelting. Water quality in Silver Bow Creek improved. Water quality data indicate that the surface and ground water continue to be contaminated by heavy metals and nutrients.

Rocker:

Rocker is located about five miles west of Butte. Rocker grew around the Bluebird mine but died back when the mine shut down in 1893. The town later revived when the Butte, Anaconda, and Pacific railroad between Butte and the Anaconda Smelter chose Rocker as its division point. Rocker was named for an early mining tool which resembles a cradle. The "rocker" was used to wash gold from gravel.

Ramsay:

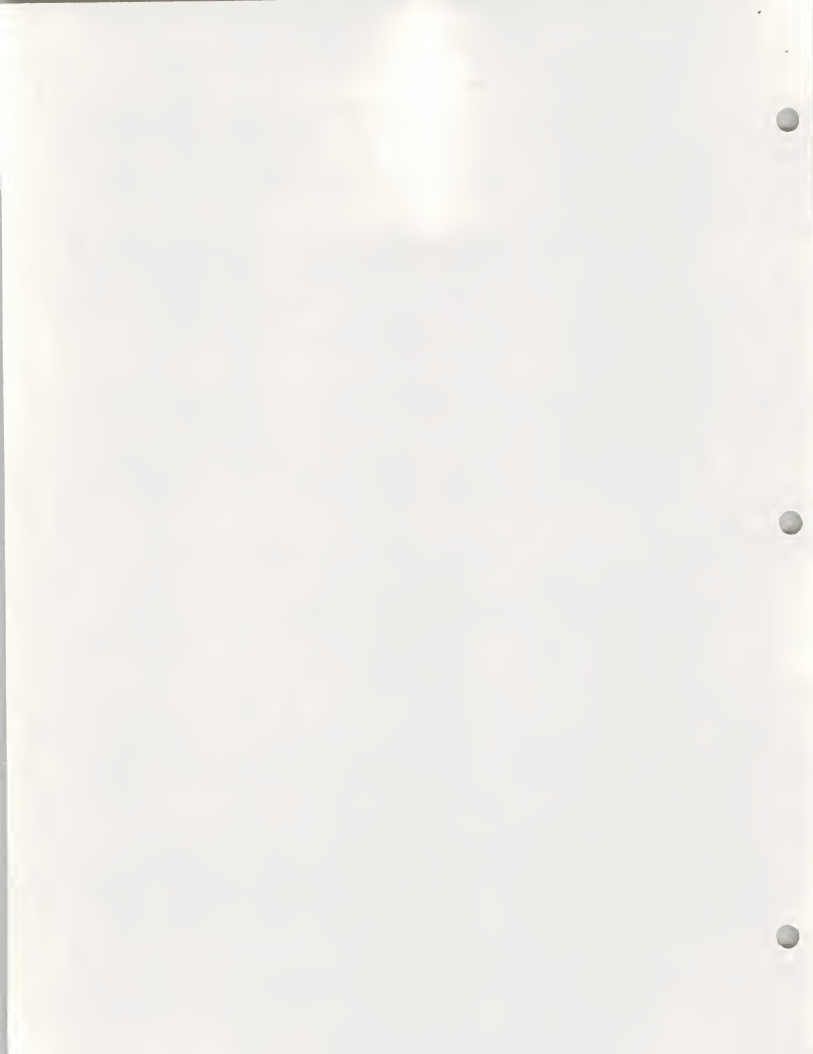
Ramsay is located about 12 miles west of Butte along U.S. Interstate 90. Ramsay originated as a Northern Pacific Station and its post office opened in 1916. Ramsay is a small, quiet town, and is located northwest of the Stauffer Chemical Plant.

Warm Springs:

Warm Springs was named for nearby hot water springs. Its post office opened in 1871. The Montana State Hospital in Warm Springs opened in 1895 and still operates today. Warm Springs has a population of 300.

Deer Lodge:

Deer Lodge is located on the Clark Fork River about 35 miles northwest of Anaconda. The population is 4,500 in town and between 8,000 and 9,000 in the trading area. Deer Lodge is the county seat of Powell County and location of the Montana State Prison.



Deer Lodge got its start with cattle ranching in the late 1850s when Johnny Grant started a large cattle operation. In 1866, Conrad Kohrs bought the ranch and expanded the operation, spreading over as much as one million acres of land in four states and Canada. In 1972, the National Park Service bought the ranch and turned it into a National Historic Park.

Deer Lodge still depends on agriculture but also derives its economy from tourism, timber, the state prison, the Cominco-American phosphate mine, nearby Galen State Hospital, Warm Springs State Hospital, and governmental offices.

Garrison:

Garrison, for years, was a stopping off point and intersection for the railroad. Garrison was originally called Little Blackfoot but the name was later changed. The name Garrison came from Fannie Garrison Villard, the wife of an early Northern Pacific Railroad president. Ms. Villard was a famous women's suffrage and peace activist, and the daughter of abolitionist William Lloyd Garrison.

Today, Garrison still has railroad activity, but since Interstate 90 is now routed past it, it is a quieter town than before.

Bearmouth:

Bearmouth is located on the Clark Fork River at the base of Bear Gulch, a once-prosperous gold mining district. The first residents of Bear Mouth were Chinese miners who arrived in the 1860s. The number of miners grew steadily until a point when an estimated 5,000 miners roamed the area.

The Northern Pacific and Milwaukee railroads ran through Bearmouth which located on the Mullan Trail. Today, Bearmouth consists mostly of a restaurant, campground and fishing access.

Because the many of the small towns along the Clark Fork drainage are unincorporated, there are no population estimates for them. The Montana Department of Commerce provided the following July 1987 estimated census information for the counties the Silver Bow Creek site touches: Silver Bow, Deer Lodge, Powell, Granite and Missoula counties. The population of Silver Bow County is 33,700. The population of Deer Lodge County is 10,000. Powell County's population is 6,900. Granite County's population is 2,700. Missoula County is not included because the site barely enters that county.



COMMUNITY PROFILE

The communities included in the Silver Bow Creek site are composed of diverse populations. With a population of 30,000, Butte is the largest of these communities, and is characterized by a wide mix of ethnic groups, including native Americans, Irish, Mexicans, Slavs, Serbians, English, and Finns. Local government is a unified city-county government called Butte-Silver Bow with an elected chief executive and 12-member commission.

Historically, Butte has been a company town. For nearly a century, the majority of the city's laborers worked for AMC. The workers were members of strong unions and were relatively well-paid for difficult and sometimes dangerous labor. Butte became economically depressed when the mines closed in 1983. In the past few years, strong local leadership and a commitment to economic diversification has helped Butte get back on its feet economically.

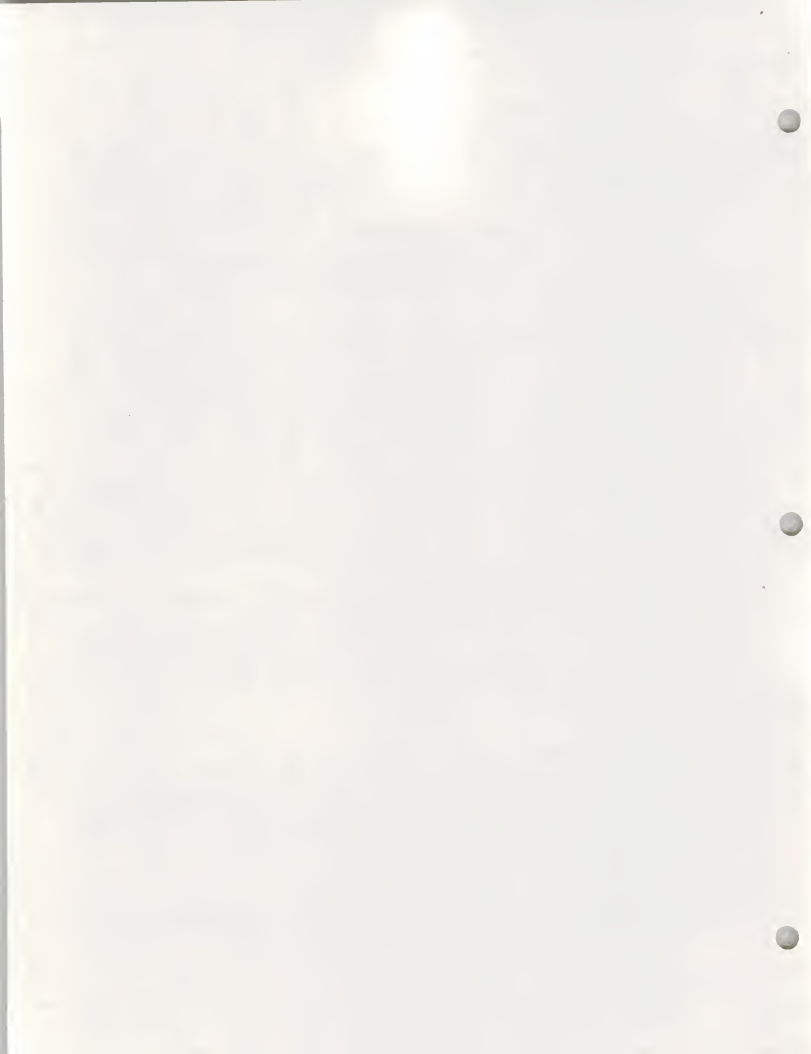
Montana Power Company is now the principal employer in Butte. A major regional hospital located in the city is another major employer. In addition, residents with scientific and technical backgrounds have moved into Butte to staff new consulting and engineering companies. Faculty members at Montana College of Mineral Science and Technology constitute another group with scientific and technical backgrounds.

Downstream from Butte are several rural communities, including Drummond, Opportunity, Crackerville, Deer Lodge, Garrison, Gold Creek, Bearmouth and Clinton. Residents downstream make their living from tourism, agriculture, and agricultural support services. Many spend their spare time in outdoor pursuits such as hunting and fishing.

COMMUNITY INVOLVEMENT

Many area residents and local officials have expressed a strong interest in the Superfund sites in their area. Area residents outside of Butte, including those residents who are not publicly active in site affairs, expressed concern about protecting the environment.

- City-county officials of Butte-Silver Bow. Elected and appointed local government officials have strong opinions on the definition of site boundaries



and the impacts that mining contamination has on the local economy.

- Sporting groups. Ducks Unlimited (DU), Anaconda and Skyline Sportsmen, and Trout Unlimited have members in the area who have expressed concern about Superfund and other government reclamation activities in the area. DU has proposed the development of wetlands in several strategic areas. A project to develop duck habitat on the Opportunity Ponds was given up in 1987 because of EPA regulations. Some DU members have expressed frustration toward EPA bureaucracy.

- Environmental groups. The Clark Fork Coalition (CFC) is an organization of individuals and groups concerned about the Clark Fork River Basin. Membership of this group includes representatives from the League of Women Voters, the Environmental Information Center, the Montana Wildlife Federation, Trout Unlimited, Montana Power Company, Champion International, as well as private citizens and other industries from Montana and Idaho. In the spring of 1985, one member traveled to Washington, D.C., met with EPA officials there and obtained support for a CFC proposal to expand the boundaries of the site to include areas downstream from Deer Lodge. She indicated she had first tried to work through the EPA Montana office but concluded that their approach would result in a piecemeal RI/FS.

-Historic preservation groups. Butte has been designated a national historic landmark district. The city is protected by the National Historic Preservation Act of 1966, which requires any federal agency with direct or indirect jurisdiction over a proposed federally funded project to consider the impact of such a project on any historic sites.

-Agricultural groups. Because contaminants in the Clark Fork River have migrated to agricultural land, via irrigation ditches, soil conservation districts have become interested in the Silver Bow Creek site. The U.S. Soil Conservation Service is working to mitigate the effects of contamination. Meanwhile, many acres of agricultural land in the Deer Lodge Valley are barren, showing the effects of heavy metals poisoning.



COMMUNITY CONCERNS

Though many Butte and Anaconda area residents have lived with the potential contamination all their lives, most people are respectful of the hazards associated with direct contact with the tailings and other wastes. Even many of those who do not recognize the risks tend to have strong personal opinions about Superfund activities planned for their communities.

In the Deer Lodge and Drummond area, there is a large number of people who have an extremely low awareness of the site in general and, thus, appear not to be concerned about it. However, local officials said the people in the area will show more interest as they become more educated about the site.

A variety of concerns have been voiced by people along the Silver Bow Creek site, although the most often expressed concerns are related to the economy, foremost, and the environment, second. Following is a list of the concerns voiced:

* Government activities

When discussing their attitudes toward federal, state, and local government generally and EPA and MDHES specifically, people were divided. Most people in the site area expressed frustration toward federal government and EPA, saying that they are too distant geographically as well as emotionally.

State government and MDHES, most said, are closer. Butte residents have often expressed a strong desire to have the Superfund offices there. Overall, people in the various communities expressed a desire to see local government more truly involved in Superfund activities. Other people, in the Drummond and Deer Lodge area, said they have a hard time backing government projects unless they see real action. They said they are skeptical about government workers who come to their towns and tell them what they plan to do and then never seem to carry through.

* Possible contamination of Silver Bow Creek and the Clark Fork by mine water.

As a result of the shut-down of the AMC dewatering pumps, the mines in Butte are filling with water, some of which is contaminated with metals.



Residents of Butte and the surrounding area have voiced strong concerns about the mine flooding problem. The public in Butte has voiced concern that the problem will not be solved and Butte will be flooded.

*** Site boundaries**

Few people interviewed had a clear idea of the site boundaries. While some people understand that the site stretches from Butte to Milltown, few people had a clear idea of the site boundaries side to side, across the Clark Fork River. Some people in the Deer Lodge and Drummond area expressed the belief that the Silver Bow Creek site was only in Butte. Exclusion of the Clark Fork River below the Milltown Dam was another concern. Some people voiced concern that contamination below the dam will never be cleaned up if that area is not included in the site boundaries.

*** Schedule and duration of Superfund activities**

Many people believe that the problem has been studied extensively, that the problems are well-known, and that the identity of the polluter is common knowledge. They want the investigation to end and the cleanup to begin.

*** Confusion as to who is doing what job at the site.**

Because of the large number of groups and agencies working on the site, the average person has a difficult time understanding who is performing what task or study and with which tax dollars. Governor Ted Schwinden initiated the Clark Fork River Basin Task Force to monitor and coordinate the efforts of the various entities.

*** Public Health**

People expressed fears about how the heavy metals and arsenic in the air, water, and soil will affect their health. Several people noted the large incidence of cancer in their neighborhoods.

*** Effect on sports and tourism.**

Fishing and hunting are exceptional in most parts of Montana and draw a large number of tourists. Silver Bow Creek does not support fish and the fish numbers are small on the Clark Fork River. The effects of heavy metals on



ducks is also a concern. Many people want to see the area cleaned up so tourism won't suffer.

*** Too technical information**

Most residents expressed a desire to learn more about the site but said the reports are much too technical, as are many of the presentations they see. They requested the state and the EPA explain everything in layman's terms.

*** Stability of the Warm Springs Ponds.**

Deer Lodge residents, especially, expressed concern that a major flood will break the embankments of the Warm Springs Ponds, thus releasing the sediments held there into the Clark Fork River.

OBJECTIVES OF THE COMMUNITY RELATIONS PLAN

The following objectives will be kept in mind while conducting community relations for the Silver Bow Creek site:

1) Keep interested parties informed about activities at the site.

Provide information to the public during any and all stages of the Superfund process. Handle all media and public inquiries through a single, central contact with the Department of Health and Environmental Sciences. Provide all information, especially technical information, in a manner understandable to all interested parties. Make available to the public a list of repositories.

Keep local officials informed of developments and activities at the site. Most officials interviewed during the on-site discussions said they have not been kept up-to-date about the site, and expressed a desire to be kept informed of even the minor developments and activities.

2) Encourage the public to voice their opinions, concerns and questions about the site.

Public meetings should include a chance for the public to speak out or to



ask questions. A comment period will be allowed at the various study and decision stages.

3) Resolve confusion about the Superfund sites in the Clark Fork River Management System.

4) Resolve confusion about how different agencies interact on the Clark Fork River Management System.

5) Remain sensitive to changes in community concerns and monitor the public relations situation throughout the site work.

6) Provide better advance and follow-up explanations about sampling and test results to area residents.

Sampling should never be conducted unless affected residents are first notified of the upcoming activity. Follow-up, in the form of letters or direct contact should also be provided to answer further questions.

COMMUNITY RELATIONS ACTIVITIES

The techniques listed below are designed to meet the community relations objectives outlined in the previous section. Project staff must remain sensitive to community attitudes and atmosphere and revise the plan as conditions require. Following is a list of the community relations activities:

1) Citizen group meetings

Periodic information meetings should be held with various groups including the Clark Fork Coalition, local governments, the soil conservation districts, etc. A good way to keep local government officials informed is by attending their meetings and giving them informal updates about the site. More elaborate presentations will be suitable for groups such as Rotary and the Clark Fork Coalition. Once the feasibility study has been completed and the



remedial alternatives identified, a meeting will be held with the residents to get their comments, suggestions, and preferences. Notification will be given two weeks before the meeting and comments will be entertained for 30 days after the meeting.

2) Press releases

Most people interviewed said they learn about the site by reading about it in the paper or by hearing about it on the television or radio. Press releases are suitable for information such as meeting announcements or smaller developments in site projects. Press releases will be prepared by the Superfund Public Information Officer (SPIO) and reviewed by the appropriate project manager, Superfund manager, and applicable supervisors. Press releases will be written in Associated Press style, inverted pyramid fashion (most important information first), and double-spaced. When applicable, at the end of the release will be a note to the editor requesting that meeting information be included also in the community calendar.

3) Public Service Announcements

Public service announcements will accompany those press releases which are sent to radio and television stations. PSAs will be used for meeting notices, workshops, the toll-free line, etc.

4) Press contact list

The SPIO will maintain and yearly update the press contact list for the site. The list will include all press contacts in the site area and will note any special instructions such as the need to put PSAs on 3 X 5 cards for certain radio stations.

5) Press meetings

Meetings with the press are especially helpful when MDHES has a large amount of information it would like to convey to the media. These meetings can be held in the afternoon before public meetings. In these press meetings the project manager can give the reporter a brief rundown of what he or she will speak about at the public meeting. The advantages of this approach,



versus no meetings or a press conference, are as follows: a) The reporter has ample opportunity to ask questions and clarify points; b) taking time with the press shows them that we are interested in them and in their accuracy; c) reporters who aren't as familiar with Superfund can catch up on more basic points; d) In these meetings, the Superfund personnel and the reporter have a chance for better one-on-one discussion. The Superfund personnel can get a better feeling for the reporter's attitude and understanding of Superfund and build a better working relationship with the press.

6) Superfund hotline

The MDHES Superfund in-state toll-free number (1-800-648-8465), or hotline, was established in June 1987 and has proven to be an effective tool for the public as well as MDHES. The public is more hesitant to call government offices when they know they will have to pay long-distance charges. The hotline eliminates this hesitancy. The MDHES community relations coordinator takes the hotline calls and responds to questions. Those questions she cannot answer are directed to the correct person, usually eliminating the phone shuffling so often encountered by the public. Calls to the hotline are monitored by the coordinator who records the date and time of the call, the question asked, the response and the time of response. Any further follow-up is also recorded. At the end of each month, the coordinator circulates her monthly report to MDHES and EPA project officers so they will be informed of what types of questions the public is asking about their sites. The hotline is in operation during business hours at MDHES.

7) Update mailing lists

A mailing list is maintained by MDHES for the site and will be updated as requests and changes are received. A form will be included on each Progress Report so interested people can mail in requests to be added, or to have their address changed.

8) Progress reports

Progress reports have taken the place of the dryly named "Fact Sheets." The term "fact sheet" implies a boring report on a site while "progress report"



implies a positive feeling of progression of events at the site. Progress reports follow basically the same format as fact sheets but information is broken down into smaller, more readable sections or "articles." More interesting headings are used on the sections to entice the reader. Progress reports are published periodically as events occur such as test results, completion of Superfund phases, etc.

9) Make file information available to the public

In some cases the public may wish to look at open file information. Requests for specific open file information will be filled by SPIO or site project managers. Requests by the public or PRP's to view files in the office, will be channeled through the Superfund attorney. In many cases, people who request site-specific information can be directed to the administrative record for that site.

10) One-on-one contact with the public

Although public meetings are effective, they can be impersonal for some situations. One-on-one contact such as door-to-door work is especially effective for getting access permission for sampling. One-on-one contact should also be used for members of the public who show exceptional positive or negative interest in Superfund activities. For instance, meetings should be arranged with leaders of public interest groups such as the Clark Fork Coalition, Congressional aides, and so on.

11) Accessing for sampling efforts

When MDHES and EPA need to take samples on private property, permission should be gained ahead of time. The community relations coordinator will contact the residents in person, explain what will be taking place, and ask the property owner to sign a permission form. The permission form, while a legal document, should be written clearly and concisely enough so the owner can read it and sign it while the coordinator waits. Furthermore, the owner should be able to feel comfortable with the permission form. The coordinator will make every effort to ensure that samplers will come only at convenient times for the



owner. The coordinator will then provide copies of the permission forms, resident contact sheets, any necessary maps, and special instructions or requests to the personnel doing the sampling.

12) Public education

Because Superfund is such a complex program, more effort should be made to educate the public as to what it is and how it works. The public often expresses frustration over the amount of time Superfund activities take and the number of studies necessary before cleanup begins. Some of these feelings could be assuaged with better public education. Furthermore, much of the public has little concept of what hazardous wastes are and how to protect themselves from them. Children who ride motorcycles on the tailings piles in Butte are a good example of this problem. An effective route for public education would be through the public schools at the junior high and high school levels. Several science teachers and administrators in Montana have expressed an interest in incorporating Superfund in their curriculums. MDHES could schedule a series of evening or weekend workshops for teachers and other interested citizens in Montana to educate them about Superfund in general and specifically about the sites.

13) Small group meetings

Informal small group meetings will be held when SPIO and project managers need to update smaller groups of citizens. An example of this type of group is the Butte area governmental officials. This kind of meeting provides the members with a better opportunity to ask questions and voice concerns than a large public meeting. Small group meetings can also be used to meet with Congressional aides, interest groups, etc.

14) Prepare other documents as necessary

Other various documents are required by Superfund law such as responsiveness summaries and proposed plans. These documents will be prepared by MDHES as required by law.



15) Maintain a central public information contact

The SPIO is the first-line contact person with the public in most cases. Questions and concerns which SPIO cannot respond to, she will turn over to the appropriate person.

16) Public meetings

After the completion of the feasibility study, an open public meeting should be held to obtain public comments and input. Prior to the meeting, the feasibility study should be made available for public review. This meeting will allow input from all interested parties.

17) Update and monitor repositories

MDHES will conduct yearly inventories of the repositories to make sure they are complete. Any missing reports will be replaced. The repositories should also be evaluated as to the use they receive. If they are not being used, they should be moved to a better location. The public should be made aware of the repositories by the use of press releases and public service announcements.



APPENDIX A

SAMPLE PRESS RELEASE



DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES



TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

Solid & Hazardous Waste Bureau
(406) 444-2821

Sept. 21, 1988

FOR IMMEDIATE RELEASE

"STARS" FIELD WORK BEGINS

HELENA -- Field work on the Superfund Streambank Tailings and Revegetation Study, nicknamed STARS, began last week along Silver Bow Creek from Butte to the Warm Springs Ponds. Blankenship Construction of Butte started Tuesday installing short access roads to the test areas.

STARS is an experimental project being conducted by the Montana Department of Health and Environmental Sciences (MDHES). The purpose is to determine if soils along Silver Bow Creek, contaminated by heavy metals, can be treated to eliminate the threat of these materials to the public health, and eliminate their detrimental effects on the environment.

During the past year, MDHES contractors have conducted STARS laboratory and greenhouse tests. The goal of STARS is to develop and test new methods which MDHES hopes will solve a variety of problems including the following:

- ♦ reducing the movement of metals into surface and ground water
- ♦ minimizing erosion of contaminated soils by water and wind
- ♦ reducing the chances of people, wildlife, and livestock coming in contact with metal-rich soils.

The building of access roads is expected to take about a week. When Blankenship Construction completes road building, MDHES contractors will plow up small test plots, 16- by 20-feet, in five locations along the creek. Each of the five locations will have 24 plots.

"The plots best represent the different types of soils and conditions



found in the area," DeMarinis explained. "The types of grasses we will test in the plots have been determined to grow well in harsh climates and in high-acid soils." Contractors are currently determining the exact plot locations, and plot construction is expected to start this week. If the ground does not freeze soon, there will be time for MDHES to seed the plots this fall.

"The STARS project is a small, but important, part of the entire Silver Bow Creek site project. STARS is one of a variety of options to be considered for the contaminated streambanks," DeMarinis explained.

The Silver Bow Creek site is one of nine Superfund sites in Montana. It runs from Butte to the Milltown Reservoir, via Silver Bow Creek and the Clark Fork River. CH2M Hill of Helena, in conjunction with the Reclamation Research Unit of Montana State University and Schafer and Associates of Bozeman, are the MDHES contractors conducting the STARS work.

- 30 -

For more information call Kathy DeMarinis, project manager, or Janie Stiles, public information officer, at the MDHES Superfund hotline at 1-800-648-8465 or 444-2821.



APPENDIX B

SAMPLE ACCESS FORMS





We have completed
Superfund Sampling on
your property.

Thank you for your cooperation.

If you have any questions, call Janie Stiles at
1-800-648-8465 (toll-free), or 444-2821.



DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES



TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

PERMISSION FOR ACCESS TO PROPERTY

I, the undersigned, am the owner, his representative, or otherwise control the real property at the location described below. Representatives of the Montana Department of Health and Environmental Sciences have informed me that elevated levels of heavy metals concentrations may be present at this location, and that they may be injurious to the health of persons residing on or near this property. I also understand that further investigative efforts are needed to describe the source of this contamination and define its extent in this vicinity.

I hereby give permission to Montana Department of Health and Environmental Sciences and their contractors and subcontractors, as well as their employees, agents and other designated representatives (who may include state and local agencies and their officials), to have access to my property and to undertake such investigations, monitoring, surveying, testing and other information-gathering as may be necessary.

Activities will consist of soil sampling.

I understand that the work described above may involve, among other things, disturbance of vegetation and the top few inches of soil on my property. I also understand that any disturbed vegetation will be restored to substantially the same condition as existed prior to such disturbance.

Property Address:

Signature of Owner/Occupant (all joint owners and tenants must sign):

(Signature)

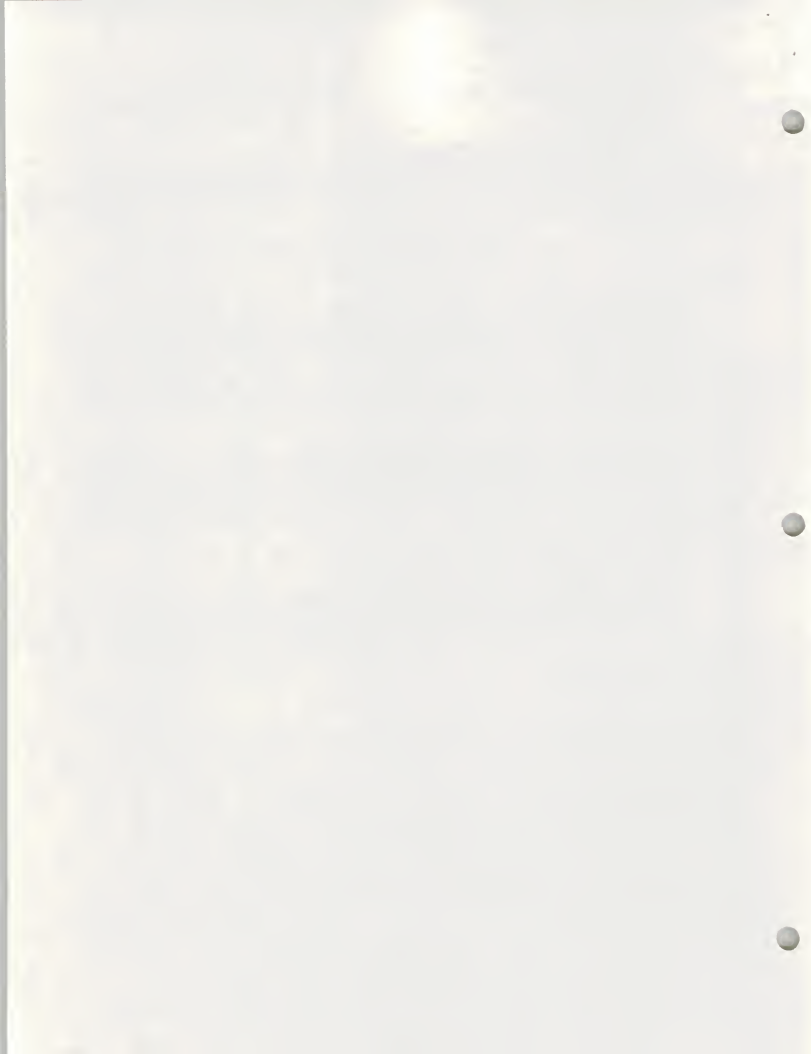
(Date)

(Signature)

(Date)

(Signature)

(Date)



RESIDENT CONTACT SHEET

RESIDENT NAME _____

ADDRESS _____

TELEPHONE _____

DATE _____

TIME _____

TYPE OF CONTACT* _____

REMARKS

SPM or DESIGNATE _____

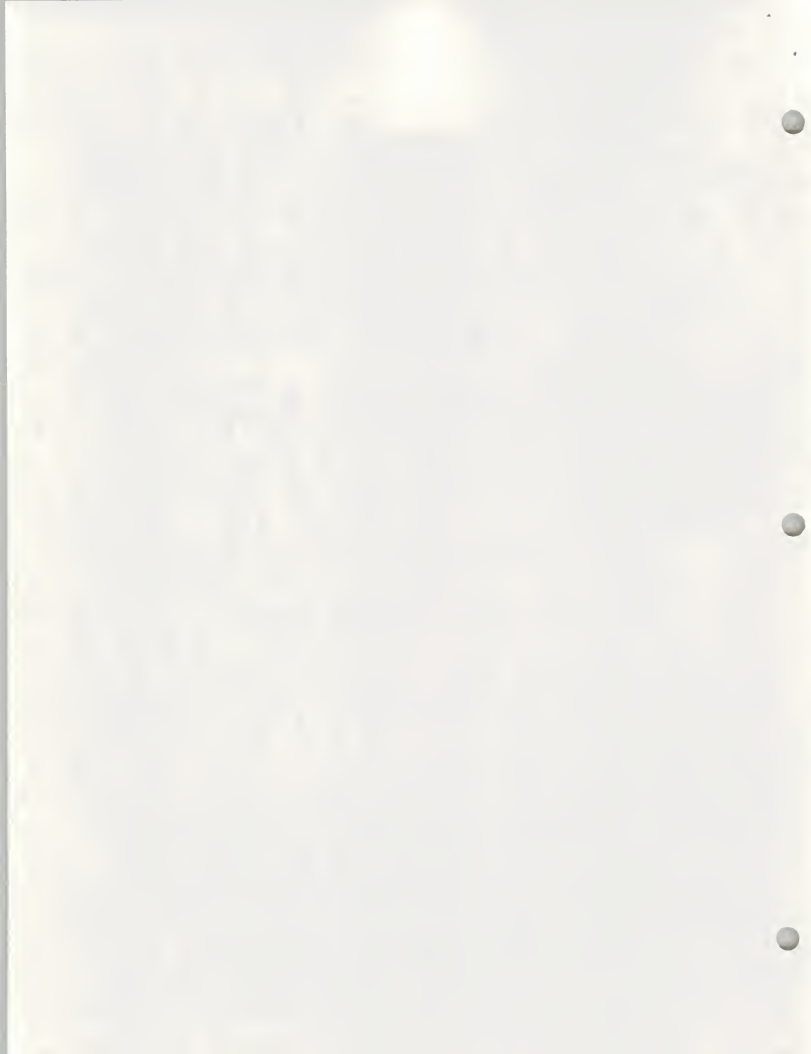
* T=Telephone; L=Letter; IP=In Person



DATE _____
DAY _____

APPOINTMENT NOTEBOOK
(Sample Page)

TIME	ADDRESS	RESIDENT	TYPE OF WORK	SUPERFUND PERSONNEL	SPM or DESIGNATE
8 A.M.					
9					
10					
11					
12 P.M.					
1					
2					
3					
4					
5					
6					
7					



QUESTIONS AND ANSWERS ABOUT THE WELL SAMPLING

WHO?

The Montana Department of Health and Environmental Sciences and their contractors, Camp, Dresser and McKee, are conducting Superfund studies in the Milltown area. Contact the following people if you have questions about the study:

Janie Stiles or Phil Hertzog in Helena
1-800-648-8465 or 444-2821

WHAT?

We will be sampling wells near the Clark Fork River in the Pinegrove area to determine if the arsenic plume in the groundwater is moving downstream from Milltown. The arsenic plume was discovered several years ago in an area underlying Milltown. This discovery led to the state and the U.S. Environmental Protection Agency installing a municipal water supply in Milltown. Studies in 1984 showed that the arsenic had not moved from the Milltown area, but as a precaution, the state has decided to re-sample wells in your area. The arsenic is coming from contaminated sediments which have been accumulating for the past 3/4 of a century. The arsenic, along with other heavy metals originally came from mining activities upstream along the Clark Fork Basin.

HOW?

Camp, Dresser and McKee will be in the Pinegrove area beginning around Oct. 31 or Nov. 1 to take the well sample. If you have a water softener, they would like to take the sample from a spigot which gets water before the softener. We need for you to run the water for approximately one-half hour before they take the sample so that any minerals or metals in the tank or in the well casing will be washed out. If you prefer, this water can be run through a garden hose and/or sprinkler so the water is not wasted. The sample can then be taken from the outside spigot. This will ensure accurate results. A representative of Camp, Dresser and McKee, probably Dennis Smith, will call you and arrange a time to take the sample. He will also tell you what date he will be there.

WHY?

The well sampling is part of a bigger study which the Montana Department of Health and Environmental Sciences is conducting in the Milltown area as part of the Superfund project. Other studies we are doing include sampling of river sediment and irrigated lands, measurements of well depth, and so on. Periodically, we will send out progress reports on site activities. Your name will automatically be added to the mailing list for these reports. If you wish to receive further information about Superfund, in general, please contact Janie Stiles at the phone number listed above.



APPENDIX C

SUMMARY OF LEGAL REQUIREMENTS GOVERNING
DEVELOPMENT OF THE
COMMUNITY RELATIONS PLAN



Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9601-9675 (amended 1986) to correct the nationwide public health, welfare and environmental problems caused by improperly managed hazardous substances. The United States Environmental Protection Agency (EPA) has been delegated the authority to issue regulations to "establish procedures and standards for responding to releases of hazardous substances" and to assign "appropriate roles and responsibilities for ... government."

The standards for governmental response under CERCLA are given detail and structure by the "National Oil and Hazardous Substances Pollution Contingency Plan" (NCP), 40 C.F.R. part 300, which functions as the road map for performing the necessary investigatory, analytical, and design activities to ensure that the cleanup of hazardous substances at a site is protective of public health, welfare and the environment and is cost effective.

Both CERCLA and the NCP recognize community relations as an important element in every site cleanup program. Specifically, the NCP (Section 300.67 (a)) requires the lead agency to develop and implement a formal community relations plan for response actions taken pursuant to CERCLA. CERCLA, as recently amended, augments the NCP community relations requirements by establishing mandatory public participation requirements which must be met by governmental entities involved in cleanup activities. 42 U.S.C. § 9617. This plan was prepared in accordance with, and is consistent with CERCLA, the NCP, and all pertinent EPA guidance. This plan will be revised as necessary, to comply with any statutory or regulatory requirements.



APPENDIX D

SUPERFUND CONTACTS AT MDHES AND EPA,

SITE REPOSITORIES



MONTANA DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES:

Director of MDHES:

Director's Office
Montana Department of Health and Environmental Sciences
Cogswell Building
Helena, MT 59620
(406) 444-2544

Solid and Hazardous Waste Bureau Chief:

Duane Robertson
Montana Department of Health and Environmental Sciences
Room B201, Cogswell Building
Helena, MT 59620
(406) 444-2821

Superfund Manager:

Michael Rubich
Montana Department of Health and Environmental Sciences
Room B201, Cogswell Building
Helena, MT 59620
(406) 444-2821

Silver Bow Creek Site Project Manager:

Kathleen DeMarinis
Montana Department of Health and Environmental Sciences
Room B201, Cogswell Building
Helena, MT 59620
(406) 444-2821

Superfund Public Information Officer:

Janie Stiles
Montana Department of Health and Environmental Sciences
Room B201, Cogswell Building
Helena, MT 59620
(406) 444-2821 or 1-800-648-8465 (in-state only)

U.S. ENVIRONMENTAL PROTECTION AGENCY, HELENA, MONTANA, OFFICE:

Project Officer:

D. Scott Brown
301 South Park
Drawer 10096
Helena, MT 59626
(406)449-5414



SILVER BOW CREEK SITE REPOSITORIES

Butte Public Library
106 West Broadway
Butte, MT 59701

Montana State Library
Capitol Complex
Helena, MT 59620

Grant-Kohrs Ranch National Historic Site
National Park Service Office
Deer Lodge, MT 59722

Mansfield Library
University of Montana
Missoula, MT 59812

Library
Montana Tech
Butte, MT 59701

Montana EPA Office
301 South Park
Federal Building
Helena, MT 59626

Documents Dept.
Renne Library
Montana State University
Bozeman, MT 59715

